

# EXHIBIT B

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13 *Attorneys for Plaintiffs*

14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 DAVID HOUGH; *et al.*

17 Plaintiffs,

18 vs.

19 RYAN CARROLL; *et al.*

20 Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION TO STAY  
DEFENDANT WELLS FARGO'S  
TIME TO FILE A RESPONSIVE  
PLEADING PENDING  
PLAINTIFFS' FORTHCOMING  
SECOND AMENDED COMPLAINT**

Presiding Judge: Hon. Wesley L. Hsu  
Trial Date: N/A

21  
22  
23 **STIPULATION TO STAY DEFENDANT WELLS FARGO'S TIME TO FILE**  
24 **A RESPONSIVE PLEADING PENDING PLAINTIFFS' FORTHCOMING**  
25 **SECOND AMENDED COMPLAINT**

26 This Stipulation is entered into by and between Plaintiffs and Defendant Wells  
27 Fargo, through their respective counsel of record.  
28

1  
2 WHEREAS, Plaintiffs have received third-party documents and intend to  
3 amend the currently operative First Amended Complaint to add new defendants and  
4 new allegations about existing defendants;  
5

6 WHEREAS, Plaintiffs require additional time to investigate entities and  
7 individuals to potentially be added as defendants, and to further investigate  
8 forthcoming new allegations about existing defendants;  
9

10 WHEREAS, if Plaintiffs are unable to reach agreements on subpoenas they  
11 issued, Plaintiffs anticipate filing motions to compel discovery from Wells Fargo as  
12 well as third-party banks including Thread Bank, ~~Wells Fargo~~, Bank of America, and  
13 JP Morgan—including compelling discovery of account statements, wire transfers,  
14 and third-party-agent/payment-processor transaction data—no later than July 26,  
15 2024;  
16

17  
18 WHEREAS, Plaintiffs anticipate that the discovery resulting from those  
19 motions to compel, if any, will significantly further inform Plaintiffs' allegations;  
20

21 WHEREAS, it would be most efficient—and in the interests of justice—for  
22 Plaintiffs to wait to file an amended complaint until Plaintiffs have reviewed the  
23 forthcoming discovery that they anticipate receiving shortly;  
24

25 WHEREAS, it would also be inefficient for Wells Fargo to file a pleading  
26 responsive to the currently operative complaint when the parties anticipate that  
27 another amended complaint will be filed;  
28

1 IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

2 The deadline for Wells Fargo to file a responsive pleading to the current  
3 complaint should be stayed.  
4

5 Plaintiffs should be ordered to file an amended complaint no later than October  
6 31, 2024.

7 Wells Fargo should be ordered to file a responsive pleading no later than 30  
8 days from the date Plaintiffs file their amended complaint.  
9

10 This stipulation is made without prejudice to any party's right to seek further  
11 extensions or modifications by agreement or by order of the Court for good cause.  
12

13 IT IS SO STIPULATED.

14 Dated: August 14, 2024

15 /S/ Nico Banks

16 Nico Banks (CA SBN:344705)

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/s/ Michael S. Lowe

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*Attorney for Wells Fargo Bank, N.A.*

**[INSERT WELLS FARGO  
SIGNATURE]**

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1 **WORD COUNT COMPLIANCE CERTIFICATION**

2 The undersigned, counsel of record for Plaintiffs, certifies that this brief contains  
3 fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

4 /s/Nico Banks

5 Nico Banks

6 Dated: August 14, 2024

7 **ATTESTATION**

8  
9 Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on  
10 whose behalf the filing is submitted, concur in the filing's content and have  
11 authorized the filing.

12  
13 /s/ Nico Banks  
14 Nico Banks

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15 **CERTIFICATE OF SERVICE**

16  
17 On August 14, 2024, I served this motion and accompanying papers via first-class  
18 mail to the parties listed below with addresses below their names, and via email to  
the parties with email addresses below their names:

19 JARED DAY;  
20 19710 Chara Ct,  
21 Cypress, TX 77433

22 CHRISTINE CARROLL;  
23 11298 Snow View Ct,  
24 Yucaipa, CA 92399

25 TRAVIS MARKER; THE LAW OFFICE OF TRAVIS R. MARKER, A  
26 PROFESSIONAL CORPORATION (D.B.A. "MARKER LAW AND  
27 MEDIATION"); & PARLAY LAW GROUP A PROFESSIONAL  
28 CORPORATION  
333 2nd St.  
Suite 16,

- 5 -

STIPULATION TO EXTEND WELLS FARGO'S TIME TO FILE AN ANSWER A RESPONSIVE PLEADING

1 Ogden, UT, 84404

2 MATTHEW CROUCH;

3 Via email to his attorney Levi Y. Silver at lsilver@swsslaw.com

4 REYHAN PASINLI & TOTAL-APPS, INC.

5 Via email to their attorney Geoffrey Brethen at gbrethen@wattslawyers.com

6 TROY MARCHAND & QUANTUM ECOMMERCE

7 Via email to their attorney Marc Reich at mgr@reichradcliffe.com

8 BONNIE NICHOLS & WHOLESALE UNIVERSE;

9 Via email to their attorney Brad Geyer at bradford.geyer@formerfedsgroup.com

10 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing statements in this Certificate of Service are true and correct.

12 /s/Nico Banks

13 Nico Banks

14 Dated: August 14, 2024